



STATE OF UTAH  
NATURAL RESOURCES  
Oil, Gas & Mining

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January 21, 1986

(HAND DELIVERED)

Mr. Robert A. Malone, Director  
Environmental Affairs  
Kennecott  
P. O. Box 11248  
Salt Lake City, Utah 84147

Dear Mr. Malone:

RE: Review of Operator Response, New Grinding Plant and  
Private Access Road, Phase I - Site Gradation Work, UCD  
Modernization Project, ACT/035/002, Salt Lake County, Utah

The Division has completed the review of Kennecott's December 20, 1985 response to our December 6 and 17, 1985 completeness review letters. We have also reviewed the latest consultant's report on the soil sampling received January 7, 1986.

Before the technical staff can complete the review of the plans and consider approval of the same, the following information still must be provided:

DEFICIENCIES:

Rule M-3(1)(g) - JSL

The operator has not completely addressed this section. As per discussions held in our office with Kennecott representatives on December 13, 1985, the use of the Soil Conversation Soil Survey map would be adequate to delineate the soil resources of the Grinding/Milling Facility site and the proposed access road.

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Rule M-10(14) - JSL

Based on the January 7, 1986 soils submittal and subsequent onsite field visit (January 13, 1986) topsoil evaluation, the Division recommends that the following soil removal plan be implemented into the UCD, Phase I application:

- (a) All potential disturbance areas west of survey point E 17500 (refer to drawing 712-C-120) must have a total of six inches of topsoil removal.
- (b) All potential disturbance areas east of point E 17500 must have a total topsoil removal depth of twelve inches. It would be beneficial for the operator to "split" this area, delineate such on a soil survey map, and create a soil mass balance in relation to each area.
- (c) To adequately address Rule M-10(14), the operator must develop and formally submit a detailed topsoil management plan for the area(s) to be disturbed. The plan must include a narrative description of the proposed topsoil removal, storage and redistribution procedures to be undertaken for each "split area".

Title 40-8-12(b) - TJS

Kennecott's response is adequate to address informational requirements for Phase I permitting. However, additional information will need to be provided as part of the Phase II permitting process. Specific requirements will be requested as the Phase II review process continues.

Title 40-8-12(1)(b) - DH

The operator's application is adequate for Phase I (site grading) permitting purposes. However, the Division needs more detailed information regarding the ground-water monitoring program for this area as part of the permitting requirements for Phase II. Specific requirements will be forthcoming as the technical review continues for Phase II.

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Rule M-3(2) - LK

The operator should add two lbs/acre PLS of yellow sweet clover to the post-construction seed mix. While the seed mix is adequate for post-construction seeding it is not acceptable for final revegetation in that it lacks forbs and shrubs. At least three-four species of each form should be added to the final reclamation seed mix.

The operator has not described seeding methodology, the use of mulch, etc., as previously requested by the Division.

Rule M-3(2)(a)(b)(c)(e)(f) - JSL, PGL & LK

A reclamation plan and reclamation timetable must be submitted as previously requested. The anticipated time for each major task in the reclamation process has not been disclosed.

Rule M-10(7) - JSL & PGL

The operator states in the December 20, 1985 submittal that "after the three-year construction program is completed, all roads not required for operations will be graded and planted." The (Phase I) roads to be maintained and the roads to be reclaimed should be identified and outlined on the appropriate maps and in the narrative of the application for amendment of the mining and reclamation plan.

Rule M-5 - PGL

The detailed reclamation cost estimate must be submitted. A breakdown of the cost per acre and the references used for costs must be given. The reclamation cost represents a third party cost to do the approved reclamation work. The bond will need to be posted prior to any work commencing in Phase I.

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Rule M-10(9) - PGL

Please state which type of surety will be posted. It is understood that the Phase I proposal does not include any structures, therefore, structural removal need not be included in the reclamation cost estimate.

Rule M-10(1) and M-3(2)(a)(b) - PGL

The operator has stated that there may be a number of different postmining land use options to choose from upon termination of mining operations. For Phase I permitting purposes, the postmining land use must be specified and it must tie directly to the appropriate reclamation/revegetation plan.

The postmining land use and corresponding reclamation plan must be approved by the Division as both will be used in determining the reclamation bond for the Phase I project. Kennecott must select one postmining land use for Phase I and prepare a reclamation plan which will achieve that objective.

It should be understood, that the operator may submit an application to the Division to amend the approved post-mining land use any time in the future. If the alternative land use is justified and approvable, the existing reclamation plan and bond can be adjusted accordingly at that time.

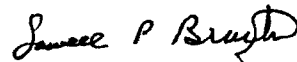
Please provide a response to the deficiencies outlined above at your earliest convenience. The Division will require at least 14 days to review Kennecott's complete response to the remaining deficiencies. Once the Division determines the plans to be complete, a public notice will be published. The notice will indicate the Division's tentative approval decision.

Final approval and issuance of a permit to commence construction activities will follow, pending: no adverse public comment; the submission of the reclamation bond; and sign off on the amount and form of the surety bond by the Board of Oil, Gas and Mining.

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Thank you for your cooperation in finalizing this permitting activity. Should questions arise, please contact me or D. Wayne Hedberg of the permitting staff.

Sincerely,



Lowell P. Braxton  
Administrator  
Mineral Resource Development  
and Reclamation Program

DWH/btb  
cc: Dennis Dalley  
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